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Attorneys for Plaintiff,
SECUGEN CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SECUGEN CORPORATION,

Plaintiff,

vs.

SUPREMA, INC.; RBH ACCESS
TECHNOLOGIES, INC.; RBH USA, INC.;
AND APIARY INC.,

Defendants.

Case No.: 11-cv-03450-SI

**STIPULATION AND ~~PROPOSED~~
ORDER FOR FINAL INJUNCTIVE
RELIEF AND DISMISSAL OF CLAIMS
AGAINST RBH ACCESS
TECHNOLOGIES, INC. AND RBH USA,
INC.**

WHEREAS Plaintiff SECUGEN CORPORATION ("SecuGen") has filed the
instant action on July 14, 2011, and filed a First Amended Complaint for Patent
Infringement on October 14, 2011 ("the Lawsuit"), alleging that Defendants RBH
ACCESS TECHNOLOGIES, INC. ("RBH Access") and RBH USA, INC. ("RBH USA")

1 infringed U.S. Patent No. 6,324,020 ("the 020 Patent") by incorporating infringing
2 fingerprint recognition devices from Suprema, Inc. ("Suprema FRDs") into products that
3 RBH Access and RBH USA have offered to sell, distributed and/or sold within the
4 United States.

5
6 **WHEREAS**, while denying any liability, RBH Access and RBH USA wish to
7 resolve the claims SecuGen has made against them in the Lawsuit, and by this Stipulation
8 and Order the parties intend to and do resolve all claims arising under and related to this
9 litigation.

10
11 **THEREFORE** the parties have agreed and hereby stipulate as follows:

12 1. Stipulated Injunctive Relief. RBH Access and RBH USA are hereby
13 permanently enjoined and prohibited from importing, offering for sale, distributing, or
14 selling within the United States products incorporating non-licensed Suprema FRDs (as
15 described in paragraphs 11 and 12 of the First Amended Complaint) including those
16 products labeled RBH-BFR-200-S, RBH-BFR-200-M, RBH-BFR-300-S, RBH-BFR-
17 300-M, and RBH-BFR-USA ("the Accused Products").

18
19 2. Production of Sales and Source Information. Within three (3) days of the
20 date of this Order, RBH Access and RBH USA shall provide to SecuGen, through its
21 counsel, the following information: (a) the identity and contact information for RBH
22 Access and RBH USA's source of the Accused Products; and (b) data sufficient to
23 disclose all sales of the Accused Products by RBH Access and RBH USA in the United
24 States.
25
26

3. Release and Dismissal of Claims. In return for the above permanent injunctive relief and sales and source information, SecuGen hereby dismisses its claims against RBH Access and RBH USA in the Lawsuit with prejudice, and SecuGen hereby releases and discharges the claims SecuGen asserted in the Lawsuit against RBH Access and RBH USA (which includes their respective shareholders, directors, officers and employees) arising from or related to the infringement of the '020 Patent as alleged in the First Amended Complaint.

SO STIPULATED:

DATED: November 30, 2011

ARCHER & GREINER, PC

By: 

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*Attorneys for Defendants
RBH Access Technologies, Inc. and RBH USA, Inc.*

DATED: November 30, 2011

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SecuGen Corporation

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 12/1/11

By: 
HON. SUSAN ILLSTON, U.S.D.J.